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5 *Attorney for Defendant Raul Segundo-Martinez*

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 v.

11 RAUL SEGUNDO-MARTINEZ,

12 Defendant.

Case No. 2:22-cr-00130-RFB-VCF

**STIPULATION TO CONTINUE
MOTION DEADLINES**

13 IT IS HEREBY STIPULATED AND AGREED, by and between Jason Frierson, United
14 States Attorney, and Kimberly Frayn, Assistant United States Attorney, counsel for Plaintiff
15 the United States of America, and Ivette Amelburu Maningo, counsel for Raul Segundo-
16 Martinez, that the Court continue the pretrial deadline and related response and reply deadlines
17 for one week (7 days).

18 The Stipulation is entered into for the following reasons:

- 19
- 20 1. The Court set the deadline for pretrial motions to be due on November 7, 2022. The
21 parties must respond to pretrial motions by November 21, 2022 and replies are to be
22 filed by November 28, 2022.
 - 23 2. Counsel for the Government, who recently entered her appearance in this case, and
24 counsel for the Defendant have conferred and have agreed upon a one-week (7 days)
extension of the pretrial motions deadline.

3. The short extension of only the pretrial motion deadlines would allow counsel for Defendant the additional time within which to review legal documents and discuss pending pretrial legal matters with the Defendant.
4. The additional time requested herein is not sought for purposes of delay.
5. The parties agree to the one-week (7 day) continuance of the pretrial motion deadlines.
6. Additionally, denial of this request for continuance could result in a miscarriage of justice. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).

For these reasons, the parties hereby stipulate to a one-week (7 day) continuance of the November 7, 2022 pretrial motions deadline, the November 21, 2022 response deadline, and the November 28, 2022 reply deadline.

DATED this 7th day of November, 2022.

The Law Offices of
Ivette Amelburu Maningo

By: /s/ Ivette Amelburu Maningo
IVETTE AMELBURU MANINGO, ESQ.
Attorney for Defendant
Enrique Martinez

By: /s/ Kimberly Frayn
KIMBERLY FRAYN, ESQ.
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

RAUL SEGUNDO-MARTINEZ,

Defendant.

Case No. 2:22-cr-00130-RFB-VCF

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. New counsel for the Government recently entered her appearance in this case.
2. Counsel for Defendant needs the additional time within which to review legal documents and discuss pending pretrial legal matters with the Defendant.
3. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for Defendant sufficient time within which to be able to effectively and completely review and discuss pretrial materials and related legal matters with the Defendant.
4. Additionally, denial of this request for continuance could result in a miscarriage of justice. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section 3161(h)(7)(B)(i), (iv).

CONCLUSIONS OF LAW

The parties agree to the one-week (7 days) continuance of the deadline for pretrial motions and the deadline to the respond and reply to pretrial motions.

ORDER

IT IS THEREFORE ORDERED that the parties herein shall have to and including 14th day of November, 2022, to file any and all pretrial motions and notice of defense.

IT IS FURTHER ORDERED that the parties shall have to and including 21st day of November, 2022 to file any and all responses.

IT IS FURTHER ORDERED that the parties shall have to and including 28th day of November, 2022 to file any and all replies.

DATED: November 14, 2022



HONORABLE RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE